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10 Attorneys for Defendant
11 SHARP ELECTRONICS CORPORATION

12
13 UNITED STATES DISTRICT COURT

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15 NORTHERN DISTRICT OF CALIFORNIA

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17 SAN FRANCISCO DIVISION

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29 Frederick Rozo, on behalf of himself and all others similarly situated,)
30 Plaintiff,) No. C-06-7693 SI
31 v.) STIPULATION AND [PROPOSED]
32 LG Phillips LCD Co., Ltd, et al.,) ORDER EXTENDING TIME TO
33 Defendants.) RESPOND TO COMPLAINT

34 **STIPULATION FOR EXTENSION OF TIME**

35 WHEREAS plaintiff filed a complaint in the above-captioned case on or about
36 December 12, 2006;

37 WHEREAS plaintiff alleges antitrust violations by manufacturers of Liquid Crystal
38 Display (“LCD”) products;

39 WHEREAS more than fifteen complaints have been filed to date in federal district
40 courts throughout the United States by plaintiffs purporting to bring class actions on behalf
41 of indirect purchasers alleging antitrust violations by manufacturers of LCD products
42 (collectively, “the LCD Cases”);

1 WHEREAS there are motions pending before the Judicial Panel on Multidistrict
 2 Litigation to transfer the LCD Cases to the Northern District of California or the District of
 3 New Jersey for coordinated or consolidated pretrial proceedings pursuant to 28 U.S.C. §
 4 1407;

5 WHEREAS plaintiff anticipates the possibility of Consolidated Amended
 6 Complaints in the LCD Cases;

7 WHEREAS plaintiff and defendant Sharp Electronics Corporation (“SEC”) have
 8 agreed that an orderly schedule for any response to the pleadings in the LCD Cases would
 9 be more efficient for the parties and for the Court;

10 WHEREAS plaintiff agrees that the deadline for SEC to respond to the Complaint
 11 shall be extended until the earlier of the following two dates: (1) forty-five days after the
 12 filing of a Consolidated Amended Complaint in the LCD Cases; or (2) forty-five days after
 13 plaintiff provides written notice to SEC that he does not intend to file a Consolidated
 14 Amended Complaint, provided that such notice may be given only after the initial case
 15 management conference in the MDL transferee court in this case;

16 WHEREAS plaintiff further agrees that this extension is available, without further
 17 stipulation with counsel for plaintiff, to all named defendants who notify plaintiff in writing
 18 of their intention to join this extension;

19 WHEREAS this Stipulation does not constitute a waiver by SEC or any defendant
 20 of any defense, including but not limited to the defenses of lack of personal or subject
 21 matter jurisdiction, insufficiency of process, insufficiency of service of process, or improper
 22 venue.

23 PLAINTIFF AND DEFENDANT SHARP ELECTRONICS CORPORATION, BY
 24 AND THROUGH THEIR RESPECTIVE COUNSEL OF RECORD, HEREBY
 25 STIPULATE AS FOLLOWS:

26 1. The deadline for the SEC to respond to the Complaint shall be extended until
 27 the earlier of the following two dates: (1) forty-five days after the filing of a Consolidated
 28 Amended Complaint in the LCD Cases; or (2) forty-five days after the plaintiff provides

1 written notice that he does not intend to file a Consolidated Amended Complaint, provided
2 that such notice may be given only after the initial case management conference in the
3 MDL transferee court in this case.

4 2. This extension is available, without further stipulation with counsel for
5 plaintiff or further order of the Court, to all named defendants who notify plaintiff in
6 writing of their intention to join this extension.

7 IT IS SO STIPULATED.

8

9 Dated: January 8, 2007

Dated: January 8, 2007

10 Signature: /s/ Christopher L. Lebsock

Signature: /s/ Albert J. Boro, Jr.

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23 Counsel for Plaintiff Frederick Rozo

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25 SO ORDERED:

26 Dated:


United States District Judge

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